

1 Thomas A. Connelly (AZ Bar #019430)
Robert T. Mills (AZ Bar #018853)
2 Sean A. Woods (AZ Bar #028930)
MILLS + WOODS LAW PLLC
3 5055 North 12th Street, Suite 101
Phoenix, Arizona 85014
4 Telephone 480.999.4556
5 docket@millsandwoods.com

6 DeeAn Gillespie Strub (AZ Bar #009987)
GILLESPIE, SHIELDS & TAYLOR
7 7319 North 16th Street
Phoenix, Arizona 85020
8 Telephone: (602) 870-9700
Fax: (602) 870-9783
9 mailroom@gillaw.com
10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF ARIZONA**

13
14 Jessica Kahraman, *et al.*,
Plaintiffs,
15
16 v.
17 State of Arizona, *et al.*,
18 Defendants.

Case No.: 2:22-cv-00375-PHX-SRB

**CONSENT MOTION FOR
EXTENSION OF TIME FOR
PLAINTIFFS TO RESPOND TO
DEFENDANT GWYNETH KELLY'S
MOTION FOR JUDGMENT ON THE
PLEADINGS**

19
20
21 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and LRCiv 7.3(a), Plaintiffs make this
22 uncontested motion for an enlargement of time for Plaintiffs to file and serve their
23 response to *Defendant Gwyneth Kelly's Motion for Judgment on the Pleadings* (Doc.
24 153), filed on 25 August 2023. Plaintiffs make this request in good faith and not for
25 purposes of delay.

26
27 During the course of finalizing Plaintiffs' response to Defendant Kelly's
28 motion for judgment on the pleadings (Doc. 153), which response is currently due

1 on September 15, 2023, and which Defendant Kaplan-Siekman has joined (Doc.
 2 155), and then beginning the process of finalizing Plaintiffs' response to Defendant
 3 Kaplan-Siekman's separate motion for judgment on the pleadings (Doc. 154),
 4 which is currently due on September 18, 2023, it became clear there is substantial
 5 overlap between the two motions and responses. Consequently, Plaintiffs believe
 6 it makes sense logistically and as a means of conserving judicial resources to
 7 combine the two responses into one filing. Accordingly, Plaintiffs need a few more
 8 days to combine the two separate responses into one filing and finalize that
 9 combined filing. There is no prejudice to Defendant Kelly by the short extension.
 10 Plaintiffs and Defendant Kelly have conferred by email and agree that good cause
 11 exists to extend the time for Plaintiffs to respond to Defendant Kelly's motion up
 12 to and including 18 September 2023, thus making this a consent motion.

13 Finally, due of the number of arguments asserted by Defendants and
 14 because it will be a combined response, Plaintiffs anticipate the response will be a
 15 few pages over the presumptive 17-page limit but not more than 25 pages.
 16 Plaintiffs have notified Defendant Kelly of this issue in a subsequent email but
 17 have not received a response from Kelly's counsel because of the lateness of the
 18 hour of that subsequent email. Plaintiffs reasonably anticipate that Defendants
 19 will not object to the extra pages.

20 A proposed Order is also submitted for the Court's consideration.

21 **RESPECTFULLY SUBMITTED** this 15th day of September 2023.
 22

23 **MILLS + WOODS LAW PLLC**

24 By /s/ Thomas A. Connelly
 25 Thomas A. Connelly
 26 Robert T. Mills
 27 Sean A. Woods
 28 5055 N. 12th St., Ste. 101
 Phoenix, AZ 85014

1
2 **GILLESPIE, SHIELDS & TAYLOR**

3 DeeAn Gillespie Strub

4 7319 N. 16th St.

5 Phoenix, AZ 85020

6 *Attorneys for Plaintiffs*

7
8
9 **CERTIFICATE OF SERVICE**

10 I hereby certify that on September 15, 2023, I electronically transmitted the
11 foregoing document to be filed electronically with the Clerk's Office through the
12 CM/ECF System for filing and transmittal of a Notice of Electronic Filing to be
13 served on all counsel of record via the Court's CM/ECF system.
14

15 /s/ Thomas A. Connelly
16
17
18
19
20
21
22
23
24
25
26
27
28